

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 7
NLG, LLC,	Case No. 21-11269 (JKS)
Debtor.	
ALFRED T. GIULIANO, Trustee,	
Plaintiff,	
v.	Adv. No. 22-50086 (JKS)
SELECTIVE ADVISORS GROUP, LLC,	
Defendant.	

**SELECTIVE ADVISORY GROUP’S S OPPOSITION TO TRUSTEE’S MOTION
FOR ORDER HOLDING ADVERSARY PROCEEDING IN ABEYANCE**

Selective Advisors Group, LLC (“Selective”), by and through its undersigned counsel, files its Opposition to Alfred T. Giuliano (the “Trustee”), the Chapter 7 trustee for the estate of NLG, LLC’s (“NLG” or the “Debtor”) Motion to hold the above captioned adversary proceeding in abeyance until further order of the Court (the “Motion”) and, in support hereof, respectfully states as follows:

1. The complaint in this adversary proceeding asks the Court to revisit and overturn a state court judgment. There is no question that the Court lacks jurisdiction to do so under the Rooker-Feldman doctrine.

2. All causes of action asserted in this proceeding are meritless and time-barred, as has been determined by various trial and appellate courts.

3. There is no basis to hold this adversary proceeding open/in abeyance.

4. Selective hereby incorporates the factual and legal bases to be filed in its motion to

dismiss over the weekend.

For the foregoing reasons, Selective asks that the Court deny the Trustee's Motion.

Dated: May 6, 2022
Wilmington, Delaware

Respectfully submitted,

KLEIN LLC

/s/ Julia Klein

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